

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

**Caption in Compliance with D.N.J. LBR 9004-1(b)**

**VINSON & ELKINS LLP**

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*Counsel for the Ad Hoc Customer Group*

In re:

Powin, LLC, *et al.*,<sup>1</sup>

Debtors.

Case No. 25 – 16137 (MBK)

Chapter 11

(Jointly Administered)

<sup>1</sup> The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor's federal tax identification number, are: (i) Powin, LLC [0504], (ii) PEOS Holdings, LLC [5476], (iii) Powin Project LLC [1583], (iv) Powin China Holdings 1, LLC [1422], (v) Powin China Holdings 2, LLC [9713], (vi) Charger Holdings, LLC [5241], (vii) Powin Energy Ontario Storage, LLC [8348], (viii) Powin Energy Operating Holdings, LLC [2495], (ix) Powin Energy Operating, LLC [6487]. The Debtors' mailing address is 20550 SW 115th Avenue Tualatin, OR 97062.

**VERIFIED STATEMENT PURSUANT TO RULE 2019 OF  
THE FEDERAL RULES OF BANKRUPTCY PROCEDURE**

In connection with the chapter 11 cases (the “*Chapter 11 Cases*”) of the above-captioned debtors and debtors in possession (collectively, the “*Debtors*”), pursuant to Rule 2019 of the Federal Rules of Bankruptcy Procedure (the “*Bankruptcy Rules*”), Vinson & Elkins LLP (“*Counsel*”) hereby submits, both on its own behalf and on behalf of the Ad Hoc Customer Group (as defined below), the following verified statement (this “*Statement*”) with respect to Counsel’s representation of certain creditors and/or parties-in-interest in these Chapter 11 Cases in their capacities as customers of the Debtors (the “*Ad Hoc Customer Group*”). In support of the Statement, Counsel respectfully states as follows:

1. The name and address of each of the members of the Ad Hoc Customer Group represented by Counsel are as follows:

	<b>Name</b>	<b>Address</b>
a.	Lone Star Solar, LLC	1519 King Street Charleston, SC 29405
b.	Idaho Power Company	1221 W. Idaho St. Boise, ID 83702
c.	West Warwick Energy Storage 1, LLC	7 Times Square Suite 3504 New York, NY 10036
d.	West Warwick Energy Storage 2, LLC	7 Times Square Suite 3504 New York, NY 10036
e.	West Warwick Energy Storage 3, LLC	7 Times Square Suite 3504 New York, NY 10036

2. The nature and amount of disclosable economic interests held in relation to the Debtors are as follows: as of the date of this Statement, the members of the Ad Hoc Customer Group hold claims against the Debtors, which may include unsecured pre-petition claims, postpetition administrative expense claims, and potentially other claims, including for potential

rejection damages in the event their respective contracts with the Debtors are rejected and potential claims related to liens asserted against members of the Ad Hoc Customer Group. The full amount of each of the members' respective claims is undetermined at this time. The foregoing information is based upon information provided by the members of the Ad Hoc Customer Group to Counsel and is subject to change.

3. Counsel does not represent the Ad Hoc Customer Group as a "committee" (as such term is used in the Bankruptcy Code and Bankruptcy Rules). In addition, the Ad Hoc Customer Group does not represent or purport to represent any other entities in connection with these Chapter 11 Cases. Each of the members of the Ad Hoc Customer Group do not represent the interests of, nor act as a fiduciary for, any person or entity other than itself in connection with the Chapter 11 Cases.

4. Counsel submits this Statement out of an abundance of caution, and nothing herein should be construed as an admission that the requirements of Bankruptcy Rule 2019 apply to Counsel's representation of the Ad Hoc Customer Group. Nothing contained in this Statement should be construed as (i) a waiver or release of any claims against the Debtors by any of the members of the Ad Hoc Customer Group, (ii) an admission with respect to any fact or legal theory, or (iii) a limitation upon, or waiver of, any right of any member of the Ad Hoc Customer Group to file and/or amend a proof of claim in accordance with applicable law and any orders entered in the Chapter 11 Cases establishing procedures for filing proofs of claim or interests.

5. The undersigned verify that the foregoing is true and correct to the best of their knowledge.

6. Counsel reserves the right to amend or supplement this Statement, and will file a supplemental statement to the extent required by Bankruptcy Rule 2019(d).

7. The information contained herein is intended only to comply with Bankruptcy Rule 2019 and is not intended for any other use or purpose.

Dated: July 21, 2025  
New York, New York

Respectfully submitted,

/s/ Steven M. Abramowitz

**VINSON & ELKINS LLP**

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